



Matt Blunt, Governor • Doyle Childers, Director

## DEPARTMENT OF NATURAL RESOURCES

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March 20, 2006

Mr. Andrew Bracker  
Brownfields Coordinator  
Department of City Planning and Development  
City of Kansas City, Missouri  
414 E. 12th Street  
Kansas City, MO 64106

Dear Mr. Bracker:

Thank you for your comment on Missouri's Risk-Based Corrective Action (MRBCA) Technical Guidance, received by e-mail on February 10, 2006.

The attached memo addresses your concern. The RAM Group, private contractor with whom the department has worked with to develop the guidance, researched this issue. They recommended the use of  $K_d$  values corresponding to a pH of 6.8 (neutral pH is 7.0). The department will change the  $K_d$  values for metals and  $K_{oc}$  values for the organics that ionize. These organics are also presented in the memo.

The above adjustment will result in a significant increase in the  $K_d$  value for mercury from 0.04 to 52. This change will result in less volatilization of mercury and hence an increase in the soil target levels protective of inhalation of vapors. Additionally, a footnote will be added to the table listing the  $K_{oc}$  values to indicate that the default  $K_{oc}$  values shown in the table correspond to a pH of 6.8. It is important to note that in Tier 3 the person performing the risk assessment may use site-specific pH values.

Thank you again for your review. I trust this response adequately addresses your concerns, but if you wish to discuss further, please feel free to contact me at the Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65102-0176 or by telephone at (573) 751-6998.

Sincerely,

HAZARDOUS WASTE PROGRAM

*(original signed by Linda Vogt)*

Linda Vogt  
Environmental Specialist IV

LV:jc

Enclosure

